

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**JOHNNY POTTS and JANICE POTTS,  
PLAINTIFFS,**

**v.**

**DYNCORP INTERNATIONAL LLC,  
JAMES MCCANTS, et al.,  
DEFENDANTS.**

\*  
\*  
\*  
\*  
\*  
\*  
\*

**3:06-cv-00124-WHA**

**INTERROGATORIES**

COME NOW the plaintiffs in the above styled cause and propound the following interrogatories regarding jurisdictional issues to the defendants in the above referenced matter:

1) Please list all recruiting activities performed by DI that led to the employment of DIFZ personnel in Alabama from 2003 to 2006.

Answer:

2) Please list all publications in which DI recruiting advertisements were published that have circulation in Alabama which were intended to obtain candidates for positions that would ultimately be DIFZ positions for the years 2003 to 2006.

Answer:

3) If you are uncertain as to whether a publication used by DI for recruiting

advertisements that would otherwise be an answer to number 2 circulates in Alabama, please state the name of such publication and its publisher.

Answer:

4) For each of the following years, please state the number of DIFZ employees that were Alabama residents at the time they were recruited and/or hired by DI or DIFZ:  
2003, 2004, 2005, 2006.

Answer:

5) Please state the number of individuals in Alabama who currently receive benefits from either DI or DIFZ stemming from employment with DIFZ.

Answer:

Respectfully submitted on this the 20<sup>th</sup> day of February, 2007.

**MORRIS, HAYNES & HORNSBY**

/s Larry W. Morris  
Attorney for Plaintiffs  
MOR007

Post Office Box 1660  
Alexander City, Alabama 35011-1660  
Phone: (256) 329-2000  
Fax: (256) 329-2015  
E-mail: kbaker@morrishaynesandhornsby.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing in the above referenced case on the 20<sup>th</sup> day of February, 2007 by filing the same electronically with the Clerk of the Court using the CM/ECF system which will send notification of the same to all attorneys of record.

/s Larry W. Morris  
Of Counsel

cc: Mr. William Steele Holman, II  
Mr. John W. Clark  
Armbrecht Jackson LLP  
Post Office Box 290  
Mobile, Alabama 36601

Mr. William Larkin Radney, III  
Barnes & Radney, P.C.  
Post Office Box 877  
Alexander City, Alabama 35010-0877

Mr. Dennis R. Bailey  
Mr. R. Mac Freeman, Jr.  
Rushton, Stakely, Johnston & Garrett, P.A.  
Post Office Box 270  
Montgomery, Alabama 36101-0270